UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

```
-------------------------------------------------------------- x
ROBERT CORWIN, Individually, and On           :
Behalf of All Others Similarly Situated,      :
                                              :   Electronically Filed
                    Plaintiff,                :
                                              :   Civil Action No.: 1:07-cv-06728-DC
            v.                                :   (ECF Case)
                                              :
BERND R. SEIZINGER, MARTINE                   :   Hon. Denny Chin
GEORGE, MARCEL ROSENCZWEIG, and               :
GPC BIOTECH AG,                               :
                                              :
                    Defendants.               :
-------------------------------------------------------------- x
```

(Additional captions on the following pages)

MOTION OF AXXION S.A. LUXEMBURG, ON BEHALF OF ITS AKROBAT FUND-VALUE, FOR CONSOLIDATION, APPOINTMENT AS LEAD PLAINTIFF, AND <u>APPROVAL OF SELECTION OF LEAD COUNSEL</u>

-- x

ISTVAN TEMESFOI, Individually, and On   :
Behalf of All Others Similarly Situated,   :

                                         :   Electronically Filed

                Plaintiff,   :

                                           :   Civil Action No.: 1:07-cv-07016-DC

          v.   :   (ECF Case)

                                           :

GPC BIOTECH AG, BERND R. SEIZINGER, :   Hon. Denny Chin
MARTINE GEORGE and, MARCEL   :
ROSENCZWEIG,   :

                                           :

               Defendants.   :
-- x

AUDREY DANG, Individually, and On Behalf   :
of All Others Similarly Situated,   :

                                         :   Electronically Filed

                Plaintiff,   :

                                           :   Civil Action No.: 1:07-cv-07476-DC

          v.   :   (ECF Case)

                                           :

GPC BIOTECH AG, BERND R. SEIZINGER, :   Hon. Denny Chin
MARTINE GEORGE and, MARCEL   :
ROSENCZWEIG,   :

                                           :

               Defendants.   :
-- x

PLEASE TAKE NOTICE that class member Axxion S.A. Luxemburg, on behalf of its

Akrobat Fund-Value ("Axxion" or "Movant"), by its counsel, hereby move this Court for an Order:

(i) consolidating the related actions; (ii) appointing Axxion as Lead Plaintiff; (iii) approving Axxion's

selection of Labaton Sucharow LLP to serve as Lead Counsel; and (iv) granting such other and

further relief as the Court may deem just and proper. In support of this motion, Axxion submits

herewith a Memorandum of Law and Declaration of Alan I. Ellman.

Dated: Sept. 24, 2007   Respectfully submitted,

LABATON SUCHAROW LLP

By: _____/s/ Christopher J. Keller_____
Christopher J. Keller (CK-2347)
Eric J. Belfi (EB-8895)
Andrei V. Rado (AR-3724)
Alan I. Ellman (AE-7347)
100 Park Avenue
New York, New York 10017
Telephone: (212) 907-0700
Facsimile: (212) 818-0477

Attorneys for Axxion and Proposed Lead Counsel for the Class

Tilp PLLC

Marc Schiefer
140 Broadway
New York, NY 10005

Counsel for Axxion